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7 CHARLYNE BASASDA

8 UNITED STATES DISTRICT COURT
9
10 NORTHERN DISTRICT OF CALIFORNIA
11
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 CHARLYNE BASADA,

17 Defendant

CASE NO. CR-15-437-CRB-1 (SK)

**STIPULATION AND ~~PROPOSED~~
ORDER PERMITTING TEMPORARY
MODIFICATION OF PRETRIAL
CONDITIONS OF RELEASE TO
PERMIT TRAVEL TO FAMILY HOME
IN SAN FRANCISCO**

Judge: The Honorable Sallie Kim

18 Defendant Charlyne Basada, by and through her attorney, Anthony Lowenstein, Esq.,
19 requests that her conditions of pretrial release be modified temporarily to allow her to travel
20 from the Halfway House to her family home at 158 Peabody St., in San Francisco, CA at the
21 following times:

22 (1) November 26, 2015, from 12:00 pm, returning 10 pm.

23 (2) December 24, 2015 from 12:00 pm, returning 10 pm.

24 (3) December 25, 2015 from 9:00 am, returning 10 pm.

25 This travel is to celebrate Thanksgiving and Christmas with her family at set family
26 gatherings with her husband, Francis Koy Basada, her children and other family members.

27 Ms. Basada has done very well on PreTrial Release; she is respectful and cooperative
28 and has followed all the terms and conditions of her PreTrial release; This travel is local, in San
Francisco, within the Northern District, and this is a short period, always returning by 10:00 pm.

Ms. Basada's Pretrial Services Officer, Brad Wilson, has been contacted by Defense
Counsel to discuss, and support this defense request.

1 The Government does not oppose and stipulates to this defense request.

2 Ms. Basada does not propose travel at any other time to any other place, beyond the
3 above stated purpose.

4
5 SO STIPULATED.

6 DATE: November 16, 2015

7 By: /s/
8 ANTHONY LOWENSTEIN
9 Attorney for Defendant
10 CHARLYNE BASADA

11 DATE: November 16, 2015

12 BRIAN STRETCH
13 United States Attorney
14 By: /s/
15 Benjamin Kingsley
16 Assistant United States Attorney
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHARLYNE BASADA,

Defendant

CASE NO. CR-15-437-CRB-1 (SK)

~~PROPOSED~~ ORDER

TEMPORARILY ALLOWING
DEFENDANT TO TRAVEL

Judge: The Honorable Sallie Kim

ORDER

PREDICATED on the above stipulation and GOOD CAUSE APPEARING, Defendant Charlyne Basada's pretrial release conditions are modified to allow travel to her family home at 158 Peabody St., in San Francisco, CA at the following times:

(1) November 26, 2015, from 12:00 pm, returning 10 pm.

(2) December 24, 2015 from 12:00 pm, returning 10 pm.

(3) December 25, 2015 from 9:00 am, returning 10 pm

All other conditions of Defendant's pretrial release shall remain in effect.

IT IS SO ORDERED.

November 17, 2015


HONORABLE SALLIE KIM
UNITED STATES MAGISTRATE JUDGE